

patent or elsewhere in the art to adjust the breakdown voltage of a protected device, independent claims 1, 8, and 12 are in condition for allowance.

The Office Action states that the Yang patent includes a breakdown voltage adjustment circuit (40). (See Fig. 3.) However, mirror-amp 40 is not a breakdown voltage adjustment circuit and does not adjust the breakdown voltage of clamping transistor 69. Rather, clamping transistor 69 is operated like a switch, such that the drain-to-source connection is either in an open state or a closed state. Upon the detection of an ESD event, mirror-amp 40 sends a signal to clamping transistor 69 to turn on clamping transistor 69. This in turn causes the ESD current to be conducted through clamping transistor 69 to protect other circuits not shown in FIG. 3. In doing so, the breakdown voltage of clamping transistor 69 remains constant.

Furthermore, independent claims 1, 8, and 12 recite adjusting the breakdown voltage of the vulnerable device. The system of the Yang patent does not make any adjustments to the vulnerable device. Instead, the Yang patent discloses turning on a transistor that is connected in parallel with a vulnerable device. As a result, the system of the Yang patent does not make any adjustment to the device being protected, but rather to the parallel-connected transistor.

The Yang patent does not include a breakdown voltage adjustment circuit and does not adjust the breakdown voltage of a vulnerable device. Furthermore, there is no teaching, suggestion, or motivation anywhere in the art of record to provide a breakdown voltage adjustment circuit, nor to adjust the breakdown voltage of a vulnerable device. As a result, independent claims 1, 8, and 12 are in condition for allowance. Reconsideration and notice to that effect is respectfully requested.

Dependent claims 2-7, 9-11, and 13-15 all depend from allowable independent claims 1, 8, and 12 respectively and are allowable therewith. In addition it is respectfully submitted that the combinations of features recited in these dependent claims are patentable on their own merits, although this does not need to be specifically addressed herein since any claim depending from a patentable independent

claim is also patentable. See M.P.E.P. § 2413.03, citing In re Fine, 5 U.S.P.Q. (BNA) 1596 (Fed. Cir. 1988).

**CONCLUSION**

In view of the foregoing, this application containing pending claims 1-15 is in condition for allowance. Reconsideration and notice to that effect is respectfully requested. The examiner is invited to contact the undersigned at the telephone number listed below, if such a call would in any way facilitate allowance of this application.

Respectfully submitted,

KINNEY & LANGE, P.A.

Date: 12/29/04

By: 

Alan M. Koenck, Reg. No. 43,724  
THE KINNEY & LANGE BUILDING  
312 South Third Street  
Minneapolis, MN 55415-1002  
Telephone: (612) 339-1863  
Fax: (612) 339-6580

AMK:BAT:bmg